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November 21, 2024

VIA ECF

Hon. Jamel K. Semper, U.S.D.J.
United States District Court
Frank Lautenberg Post Office & U.S. Courthouse
2 Federal Square
Newark, New Jersey 07102

Re: *Sterling v. Iris Energy Limited, et al.*, Case No. 2:22-cv-07273-JKS-MAH

Dear Judge Semper,

This firm, along with Davis Polk & Wardwell LLP, represents Iris Energy Limited and the Individual Defendants in the above-referenced securities class action. We write on behalf of all parties to jointly request the following briefing schedule for Defendants' motion to dismiss Plaintiffs' Second Amended Complaint (ECF No. 74), which Plaintiffs filed on November 12, 2024, in accordance with Your Honor's Order of September 27, 2024 (ECF No. 73):

- Defendants shall serve their motion to dismiss Plaintiffs' Second Amended Complaint on all parties on or before January 21, 2025;
- Plaintiffs shall serve their opposition to Defendants' motion to dismiss Plaintiffs' Second Amended Complaint on all parties on or before March 24, 2025; and
- Defendants shall serve their reply in further support of their motion to dismiss Plaintiffs' Second Amended Complaint on all parties on or before May 9, 2025.

The parties request this schedule in light of the upcoming holidays in the U.S. and Australia that include a break of several weeks in Australia, where several Defendants are located.

Due to the extended briefing schedule proposed, the parties shall initially only exchange their papers amongst themselves. The parties shall file copies of these previously-exchanged papers on CM/ECF as follows:

- Defendants shall file their motion to dismiss Plaintiffs' Second Amended Complaint on or before May 12, 2025;
- Plaintiffs shall file their opposition to Defendants' motion to dismiss Plaintiffs' Second Amended Complaint on or before May 13, 2025; and
- Defendants shall file their reply in further support of their motion to dismiss Plaintiffs' Second Amended Complaint on or before May 14, 2025.

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If the foregoing meets with Your Honor's approval, the parties request that this letter be So Ordered. We thank the Court for its assistance with this matter.

Respectfully submitted,

s/ Samuel I. Portnoy
Samuel I. Portnoy

cc: All Counsel of Record (*via ECF*)